Lakeside Union School District

COVID-19 Prevention Program (CPP)

September 9, 2022

COVID-19 Prevention Program (CPP) for the Lakeside Union School District.

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This CPP is designed to control exposures to the SARS-CoV-2 virus that may occur in our workplace.

Date: January 28, 2021/ Update August 5, 2021/ Update January 28, 2022/ Update March 15, 2022 / Update Sep 9, 2022

Authority and Responsibility

The Superintendent, **Dr. Rhonda Taylor,** has overall authority and responsibility for implementing the provisions of this CPP in our workplace. In addition, all managers and supervisors are responsible for implementing and maintaining the CPP in their assigned work areas and for ensuring employees receive answers to questions about the program in a language they understand.

All employees are responsible for using safe work practices, following all directives, policies, and procedures, and assisting in maintaining a safe work environment.

Identification and Evaluation of COVID-19 Hazards

We will implement the following in our workplace:

- Conduct workplace-specific evaluations using **Appendix A: Identification of COVID-19 Hazards** form.
- Evaluate employees' potential workplace exposures to all persons at, or who may enter, our workplace.
- Review applicable orders and general and industry-specific guidance from the State of California, Cal/OSHA, and the local health department related to COVID-19 hazards and prevention.
- Evaluate existing COVID-19 prevention controls in our workplace and the need for different or additional controls.
- Conduct periodic inspections using **Appendix B: COVID-19 Inspections form** as needed to identify unhealthy conditions, work practices, and work procedures related to COVID-19 and to ensure compliance with our COVID-19 policies and procedures.

Employee Participation

Employees and their authorized employees' representatives are encouraged to participate in the identification and evaluation of COVID-19 hazards by **engaging in facility walk-throughs with the school administrator or department supervisor.**

Employee Screening

LUSD Schools will prevent discrimination against students and staff who (or whose families) were or are diagnosed with COVID-19 or who are perceived to be a COVID-19 risk. We will actively encourage staff and students who are sick or who have recently had close contact with a person with COVID-19 to follow the Decision Tree offered by the California Department of Public Health (CDPH). CDPH Decision Tree. When necessary, our district policies encourage sick staff and students to stay at home without fear of reprisal. This guidance is designed to enable all schools to offer and provide full in-person instruction to all students safely, consistent with the current scientific evidence about COVID-19, even if pandemic

dynamics shift throughout the school year, affected by vaccination rates and the potential emergence of viral variants.

LUSD requests that all employees and families monitor for symptoms related to COVID-19 Symptoms may include:

- Fever
- Cough
- Shortness of breath or difficulty breathing
- Chills
- Repeated shaking with chills
- Fatigue
- Muscle pain
- Headache
- Sore throat
- Congestion or runny nose
- Nausea or vomiting
- Diarrhea
- New loss of taste or smell

LUSD schools will document incidents of positive cases and notify local health officials when necessary, staff, and families of exposure to a positive case of COVID-19 at school while maintaining confidentiality. Families may be notified under FERPA and state law related to the privacy of educational records.

Correction of COVID-19 Hazards

Unsafe or unhealthy work conditions, practices, or procedures will be documented in **Appendix B: COVID-19 Inspections** form, and corrected in a timely manner based on the severity of the hazards, as follows:

- The severity of the hazard will be assessed and correction time frames assigned, accordingly.
- Individuals are identified as being responsible for timely correction.
- Follow-up measures are taken to ensure timely correction.

Control of COVID-19 Hazards

1. **Face Coverings**

- Masks are optional outdoors for all in K-12 school settings.
  It is strongly recommended that K-12 students wear masks per CDPH face mask guidance.
- It is strongly recommended that adults wear face-coverings when sharing indoor spaces with students, including in School nurse office settings.
- Persons exempted from wearing a face covering due to a medical condition, should wear a non-restrictive alternative, such as a face shield with a drape on the bottom edge, as long as their condition permits it.
- We provide clean, undamaged face coverings and instruct on the appropriate wearing of face coverings for those who choose to wear them.

The District will:
- Provide information to all staff and families in the school community on proper use, removal, and washing of cloth/disposable face masks.
- Prevent harassment and bullying related to mask use.
- Strongly suggest that students, employees, contracted providers, volunteers and visitors (when allowable on campus) wear masks in the indoor setting when students are present.

LUSD's plans regarding students' use of cloth/disposable face mask:

AGE	CLOTH/DISPOSABLE FACE MASK REQUIREMENT
Preschool	It is highly recommended that children aged 2 years and older wear a cloth or disposable mask, especially when indoors or when a six-foot physical distance from others cannot be maintained*
TK through 2nd grade	Highly recommended unless exempt
3rd through 8th grade	Highly recommended unless exempt

Persons younger than two years old, anyone who has trouble breathing, anyone who is unconscious or incapacitated, and anyone who is otherwise unable to remove the face covering without assistance are exempt from wearing a face covering.

LUSD will provide a face covering to students who request one.

LUSD school plans regarding staff use of face coverings:
It is highly requested that all staff use face coverings in accordance with CDPH guidelines unless Cal/OSHA standards require respiratory protection. Workers or other persons handling or serving food must use gloves but a face covering is not mandatory. In some cases, disposable glove use may be helpful to supplement frequent hand washing or use of hand sanitizer (for example workers who are screening others for symptoms or handling commonly touched items).

1. **Physical Distancing**
   - CDPH recommends focusing on the other mitigation strategies provided in this guidance instead of implementing minimum physical distancing requirements for routine classroom instruction.
2. **Engineering Controls**

   Ventilation recommendations:
   - For indoor spaces, ventilation should be optimized, which can be done by following CDPH Guidance on Ventilation of Indoor Environments and Ventilation and Filtration to Reduce Long-Range Airborne Transmission of COVID-19 and Other Respiratory Infections: Considerations for Reopened Schools.

   We maximize, to the extent feasible, the quantity of outside air for our buildings with mechanical or natural ventilation systems. All learning spaces and workspaces are equipped with individual HVAC systems or "package units". An HVAC system consists of the unit itself and ductwork above the ceiling generally known as "plenum space". Plenum space is a part of a building that can facilitate air circulation for heating and air conditioning systems, by providing pathways for either heated/conditioned or return airflows, usually at greater than atmospheric pressure. In general, the effectiveness and efficiency of HVAC systems to filter out contaminants during the circulation process is based upon two factors:

- Air mixture – the amount of outside air brought in compared with the amount of inside, recirculated air it is mixed with, generally expressed as a percentage
- Filtration – the ability of the system to filter out and remove particles and contaminants from the air before it is circulated back into the room

The District's HVAC systems are equipped with "economizers" that vary the amount of outside air brought in depending on the outside temperature and conditions. The filtration effectiveness of HVAC systems is measured by an industry standard known as Minimum Efficiency Reporting Value or MERV, expressed as a number from 1 to 20. Generally, the higher the MERV number, the denser the filter is and, therefore, the more particles and contaminants the filter captures before circulating back into the room. It is also generally true that the higher the MERV number, the less airflow the system creates, which decreases circulation cycles, causes the system to work harder, and increases the likelihood of system breakdowns. This reduces the efficiency of the system and its useful life. Consequently, decisions on the type of filter to use relative to COVID-19 transmission are not simple as multiple factors must be considered.

Currently, our district uses MERV 8 filters that are changed 4X a year (January, April, July, and October) and the condensate coils are cleaned 1X a year.

For the 2020-21 school year we will still be using the MERV 8 filters however we plan to change the filters 6X this year (July, September, November, January, March, and May) and clean the condensate coils 2X a year.

Also, the district plans to set the HVAC to run the circulating fan in the on position during the instructional day. This is to increase airflow even when the unit is not in heating/cooling mode. In order to ensure proper ventilation during cleaning and disinfecting, windows will be opened where practicable.

Cleaning and Disinfecting

We implement the following cleaning and disinfection measures for frequently touched surfaces:

Trained custodial staff will continue to clean and sanitize procedures in accordance with CDC recommendations. Frequently touched surfaces will also be cleaned and disinfected daily using products approved for use against COVID-19 and on the Environmental Protection Agency (EPA) approved list "N".

Each school will implement strict procedures for cleaning, disinfecting, and sanitizing regularly to prevent the spread of germs, including the coronavirus. Although Custodians are primarily responsible for achieving this goal, it is also the responsibility of all school staff members to be mindful of their behavior and to clean and disinfect when and where they can. The safety of all staff members and students depends upon the individual actions of each staff member. One or two individuals cannot carry the load. It is up to everyone to participate in the process in order to achieve the highest level of cleanliness possible. To that end, the cleaning and sanitizing process will occur in layers:

1. **All staff**

Staff members using shared resources such as copy machines, telephones, computers, printers, restrooms, refrigerators, microwaves, etc. will wash their hands with soap and water for 20 seconds or use hand sanitizer before use. A spray bottle of Disinfectant, paper towels, or tissues should be available near shared resources to be used for handling equipment to avoid direct hand contact or for disinfecting after use.

Upon request, classroom teachers will be provided with a squirt bottle of Dawn soap and water to use at appropriate times to clean surfaces, touchpoints, and shared materials when appropriate. If teachers choose to use disinfectant wipes they will need to complete the training in accordance with Department of Pesticide Regulation guidelines.

2. Custodial Staff

Each school has a full-time Site Day custodian and Night Custodian, who will clean and disinfect all interior and exterior areas regularly throughout the day and night, with the exception of Dream Academy and LEAPP where we will increase custodial staffing as needed.

- Monitoring the supplies of soap, hand sanitizer, disposable facemasks, face shields, and Dawn soap and water and sprays throughout the day and stocking when appropriate
- Providing Campus Supervisors with the cleaning and disinfecting supplies for disinfecting of lunch tables between meal periods.

Should we have a COVID-19 outbreak in our classrooms, we will implement the following procedures:

Step 1   Contact the Maintenance Department immediately!
Step 2   The team will be dispatched to immediately start the lockdown of the area to be contained.
Step 3   Following the COVID-19 INDUSTRY GUIDANCE: Schools and school-based programs document from the CDPH, dated August 2, 2021. Ensure a safe and correct application of disinfectants using personal protective equipment and ventilation recommended for cleaning. Keep disinfectant products away from students.

Shared tools, equipment, and personal protective equipment (PPE)

PPE must not be shared, e.g., gloves, goggles, and face shields.

Items that employees come in regular physical contact with, such as phones, headsets, desks, keyboards, writing materials, instruments, and tools are recommended to not be shared, to the extent feasible. Where there must be sharing, the items will be disinfected between uses by classroom staff.

Hand sanitizing

In order to implement effective hand sanitizing procedures, we:

- Evaluate handwashing facilities.
- Determine the need for additional facilities.
- Encourage and allow time for employee handwashing.
- Provide employees with an effective hand sanitizer, and prohibit hand sanitizers that contain methanol (i.e. methyl alcohol).
- Encourage employees to wash their hands for at least 20 seconds each time.

Personal protective equipment (PPE) used to control employees' exposure to COVID-19

We evaluate the need for PPE (such as gloves, goggles, and face shields) as required by CCR Title 8, section 3380, and provide such PPE as needed.

When it comes to respiratory protection, we evaluate the need in accordance with CCR Title 8 section 5144 when the physical distancing requirements are not feasible or maintained.

We provide and ensure the use of eye protection and respiratory protection in accordance with section 5144 when employees are exposed to procedures that may aerosolize potentially infectious material such as saliva or respiratory tract fluids.

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Investigating and Responding to COVID-19 Cases

This will be accomplished by using the **Appendix C: LUSD Positive Case Procedures**

Employees who had potential COVID-19 exposure in our workplace will be:

- Employees shall receive HR Email Updates detailing free employee testing, as well as visit the LUSD COVID Dashboard to access employee testing information: www.lsusd.net/COVID_Dashboard

- Notices will be sent to employees who test positive for COVID-19
    - given information regarding Covid-19 and available leave
    - return to work Criteria
    - Decision Tree issued by the County Department of Public Health.

System for Communicating

Our goal is to ensure that we have effective two-way communication with our employees, in a form they can readily understand, and that it includes the following information:

- Who employees should report COVID-19 symptoms and possible hazards to, and how. Employees must report to their direct supervisor and complete the COVID Symptoms Google Form.

- That employees can report symptoms and hazards without fear of reprisal.
- Our procedures or policies for accommodating employees with medical or other conditions that put them at increased risk of severe COVID-19 illness.
- Where testing is not required, how employees can access COVID-19 testing.
- In the event we are required to provide testing because of a workplace exposure or outbreak, we will communicate the plan for providing testing and inform affected employees of the reason for the testing and the possible consequences of a positive test.
- Information about COVID-19 hazards to employees (including other employers and individuals in contact with our workplace) may be exposed to, what is being done to control those hazards, and our COVID-19 policies and procedures.
- Supervisors have been trained on: testing, return to work criteria, and positive case procedures.

Training and Instruction

We will provide effective training and instruction that includes:

- Our COVID-19 policies and procedures to protect employees from COVID-19 hazards.
- Information regarding COVID-19-related benefits to which the employee may be entitled under applicable federal, state, or local laws.
- The fact that:
    - COVID-19 is an infectious disease that can be spread through the air.
    - COVID-19 may be transmitted when a person touches a contaminated object and then touches their eyes, nose, or mouth.
    - An infectious person may have no symptoms.
- The importance of frequent hand washing with soap and water for at least 20 seconds and using hand sanitizer when employees do not have immediate access to a sink or hand washing facility, and that hand sanitizer does not work if the hands are soiled.
- Proper use of face coverings - face coverings are intended to primarily protect other individuals from

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the wearer of the face covering; although the wearing of face masks is no longer mandatory.

- COVID-19 symptoms, and the importance of obtaining a COVID-19 test and not coming to work if the employee has COVID-19 symptoms.

Exclusion of COVID-19 Cases

Where we have a COVID-19 case in our workplace, we will limit transmission by:

- Ensuring that COVID-19 cases are excluded from the workplace until our return-to-work requirements are met.
- Excluding employees with COVID-19 exposure from the workplace In accordance with the CDPH Decision Tree Continuing and maintaining an employee's earnings, seniority, and all other employee rights and benefits whenever we've demonstrated that the COVID-19 exposure is work-related. This will be accomplished by providing the following COVID-19-related benefits, workers' compensation, and various leaves:

- Sick leave and extended illness leave provided by collective bargaining agreement, policy, or statute (Education Code sections 44977 and 44978 for certificated staff; Education Code sections 45191 and 45196 for classified staff, and Labor Code sections 245-249 for employees not qualifying for other sick leave).

- Industrial accident and illness leave provided by collective bargaining agreement, policy, or statute (Education Code section 44984 for certificated staff; Education Code section 44192 for classified staff).

- Workers' Compensation benefits.

- Twelve weeks of federal Family Medical Leave Act leave / California Family Rights Act leave.

- Available vacation, comp-time, or unpaid leave (if applicable) provided by collective bargaining agreement, policy, or statute.

- Providing employees at the time of exclusion with information on available benefits.

Plan for When a Staff Member, Child, or Visitor Becomes Sick
If staff or students are exhibiting symptoms, they should immediately be sent home or picked up. If there is a serious injury or illness, we will call 9-1-1 without delay. We will seek medical attention if COVID-19 symptoms become severe, including persistent pain or pressure in the chest, confusion, or bluish lips or face. School staff will clean and disinfect those spaces where Covid-19 is suspected. We will ensure the safe and correct application of disinfectants using personal protective equipment and ventilation recommended for cleaning.

LUSD schools will notify local health officials of any positive case of COVID-19, and also notify exposed staff and families, if necessary, while maintaining confidentiality as required by state and federal laws, and will implement the necessary processes and protocols when a school has an outbreak, in accordance with CDPH guidelines.

LUSD schools will advise sick staff members and students not to return until they have met CDC criteria to discontinue home isolation, including at least 24 hours with no fever, symptoms have improved and at least 10 days since symptoms first appeared, if no Covid-19 test is taken; day 5 with a negative test .

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	Student or Staff with:	Action	Communication
1.	COVID-19 Symptoms (e.g., fever, cough, loss of taste or smell, difficulty breathing)	• Send home • Recommend testing, but monitor for symptom onset • School/classroom remain open	No Action needed
2.	Confirmed COVID-19 case infection	• Positive student or employee remains at home • If symptoms are improving, and there is no sign of fever for at least 24 hours without the use of fever-reducing medication, a covid-19 test can be taken on **day 5**. • if the Test is Negative, the student or employee can return to school the next day (day 6). • if no test is taken, return on or after day 11 with no fever, and symptoms improved. • If still testing Positive, an Antigen test can be taken each day after the 6th day. Students or Staff members can return to school/work on the day a Negative test is achieved.	Possible School community notification of a known case
3.	Tests negative after symptoms	• stay at home • can return to school when symptoms have improved	

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		• there is no fever and no fever-reducing medication has been used for at least 24 hours	

Reporting, Recordkeeping, and Access

It is our policy to:

- Report information about COVID-19 cases at our workplace to the local health department whenever required by law, and provide any related information requested by the local health department.
- Report immediately to Cal/OSHA any COVID-19-related serious illnesses or death, as defined under CCR Title 8 section 330(h), of an employee occurring in our place of employment or in connection with any employment.
- Maintain records of the steps taken to implement our written COVID-19 Prevention Program in accordance with CCR Title 8 section 3203(b).
- Make our written COVID-19 Prevention Program available at the workplace to employees, authorized employee representatives, and representatives of Cal/OSHA immediately upon request.
- Use the **LUSD Positive Case Procedures** process to keep a record of all COVID-19 cases. The information will be made available to employees, authorized employee representatives, or as otherwise required by law, with personal identifying information removed.

Return to work if you are experiencing symptoms of COVID-19:

A COVID-19 Test should be taken, and allow for **24 hours** after symptoms are resolved.

In the event that the symptom is associated with a chronic illness, provide a signed note from a licensed MD/DO/NP/PA (who manages that condition). The signed note must confirm the chronic diagnosis, including the provider's information, explain how the symptoms are unrelated to COVID-19, and be accompanied by a signed consent for the District to interact with MD/DO/NP/PA.

In the event that you test positive on an antigen or a PCR COVID-19 Test, you must isolate until you meet the following criteria:
   a. 24 hours without a fever (no meds) **AND**
   b. Symptoms are improving **AND**
   c. At least 5 days from symptom onset or test date

Return to work after testing positive for COVID-19:

You must isolate and you may return when you fulfill the following criteria:
   a. 24 hours without a fever (no meds) AND

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b. Symptoms are improving AND
c. At least 5-11 days from symptom onset or test date

Please reference the [Decision Tree](#) illustration provided by HHSA and the San Diego County Office of Education for further information.

_____   _____
Dr. Rhonda Taylor, Superintendent   **Date**

Appendix A: Identification of COVID-19 Hazards

All persons, regardless of symptoms or negative COVID-19 test results, will be considered potentially infectious. Particular attention will be paid to areas where people may congregate or come in contact with one another, regardless of whether employees are performing an assigned work task or not. For example meetings, entrances, bathrooms, hallways, aisles, walkways, elevators, break or eating areas, cool-down areas, and waiting areas.

Evaluation of potential workplace exposure will be to all persons at the workplace or who may enter the workplace, including coworkers, employees of other entities, members of the public, customers or clients, and independent contractors. We will consider how employees and other persons enter, leave, and travel through the workplace, in addition to addressing fixed work locations.

Person conducting the evaluation: **[enter name(s)]**

Date: **[enter date]**

Name(s) of employee and authorized employee representative that participated: **[enter name(s)]**

Interaction, area, activity, work task, process, equipment and material that potentially exposes employees to COVID-19 hazards	Places and times	Potential for COVID-19 exposures and employees affected, including members of the public and employees of other employers	Existing and/or additional COVID-19 prevention controls, including barriers, partitions and ventilation

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Appendix B: COVID-19 Inspections

Date: [enter date]

Name of person conducting the inspection: [enter names]

Work location evaluated: [enter information]

Exposure Controls	Status (Meets Standard / Needs Improvement)	Person Assigned to Correct	Date Corrected
Engineering			
Barriers/partitions			
Ventilation (amount of fresh air and filtration maximized)			
Additional room air filtration			
[add any additional controls your workplace is using]			
[add any additional controls your workplace is using]			
Administrative			
Physical Distancing: Teacher Desk to Other Staff Desk is 6 Feet or Greater			
Physical Distancing: Teacher Desk to Student Desks is 6 Feet or Greater			
Physical Distancing: All Student Desks Are at Least 4 Feet Apart			
Physical Distancing: Arrival and Departure			
Physical Distancing: Non-Classroom Spaces			
Surface cleaning and disinfection (frequently enough and adequate supplies)			
Hand washing facilities (adequate numbers and supplies)			
Disinfecting and hand sanitizing solutions being used according to manufacturer instructions			
[add any additional controls your workplace is using]			
[add any additional controls			

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your workplace is using]			
PPE (not shared, available and being worn)			
Face coverings (cleaned sufficiently often)			
Gloves			
Face shields/goggles			
Respiratory protection			
[add any additional controls your workplace is using]			

Appendix C: Investigating COVID-19 Cases

All personal identifying information of COVID-19 cases or symptoms will be kept confidential. All COVID-19 testing or related medical services provided by us will be provided in a manner that ensures the confidentiality of employees, with the exception of unredacted information on COVID-19 cases that will be provided immediately upon request to the local health department, CDPH, Cal/OSHA, the National Institute for Occupational Safety and Health (NIOSH), or as otherwise required by law.

All employees' medical records will also be kept confidential and not disclosed or reported without the employee's express written consent to any person within or outside the workplace, with the following exceptions: (1) Unredacted medical records provided to the local health department, CDPH, Cal/OSHA, NIOSH, or as otherwise required by law immediately upon request; and (2) Records that do not contain individually identifiable medical information or from which individually identifiable medical information has been removed.

LUSD will use the LUSD Positive Case Procedures which includes collection of the following information:

Employee (or non-employee*) name:		**Occupation (if non-employee, why they were in the workplace):**	
Location where the employee worked (or non-employee was present in the workplace):		**Date investigation was initiated:**	
Was COVID-19 test offered?		**Name(s) of staff involved in the investigation:**	
Date and time the COVID-19 case was last present in the workplace:		**Date of the positive or negative test and/or diagnosis:**	
Date the case first had one or more COVID-19 symptoms:		**Information received regarding COVID-19 test results and onset of symptoms (attach documentation):**	
Results of the evaluation of the COVID-19 case and all locations at the workplace that may have been visited by the COVID-19 case during the high-risk exposure period, and who may have been exposed (attach additional information):			

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Notice given (within one business day, in a way that does not reveal any personal identifying information of the COVID-19 case) of the potential COVID-19 exposure to:		
All employees who may have had COVID-19 exposure and their authorized representatives.	**Date:**	
	Names of employees that were notified:	
Independent contractors and other employers present at the workplace during the high-risk exposure period.	**Date:**	
	Names of individuals that were notified:	
What were the workplace conditions that could have contributed to the risk of COVID-19 exposure?		**What could be done to reduce exposure to COVID-19?**
Was local health department notified?		**Date:**

*Should an employer be made aware of a non-employee infection source COVID-19 status.

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Additional Consideration #1

Multiple COVID-19 Infections and COVID-19 Outbreaks

[This section will need to be added to your CPP if your workplace is identified by a local health department as the location of a COVID-19 outbreak, or there are three or more COVID-19 cases in your workplace within a 14-day period. Reference section 3205.1 for details.]

This section of CPP will stay in effect until there are no new COVID-19 cases detected in our workplace for a 14-day period.

COVID-19 testing

- We will provide COVID-19 tests to all employees in our exposed workplace except for employees who were not present during the period of an outbreak identified by a local health department or the relevant 14-day period. COVID-19 testing will be provided at no cost to employees during employees' working hours.
- COVID-19 testing consists of the following:
    ○ All employees in our exposed workplace will be immediately tested and then tested again one week later. Negative COVID-19 test results of employees with COVID-19 exposure will not impact the duration of any quarantine period required by, or orders issued by, the local health department.
    ○ After the first two COVID-19 tests, we will continue to provide COVID-19 testing of employees who remain at the workplace at least once per week, or more frequently if recommended by the local health department, until there are no new COVID-19 cases detected in our workplace for a 14-day period.
    ○ We will provide additional testing when deemed necessary by Cal/OSHA.

Exclusion of COVID-19 cases

We will ensure COVID-19 cases and employees who had COVID-19 exposure are excluded from the workplace in accordance with our CPP **Exclusion of COVID-19 Cases** and **Return to Work Criteria** requirements, and local health officer orders if applicable.

Investigation of workplace COVID-19 illness

We will immediately investigate and determine possible workplace-related factors that contributed to the COVID-19 outbreak in accordance with our CPP **Investigating and Responding to COVID-19 Cases**.

COVID-19 investigation, review, and hazard correction

In addition to our CPP **Identification and Evaluation of COVID-19 Hazards** and **Correction of COVID-19 Hazards**, we will immediately perform a review of potentially relevant COVID-19 policies, procedures, and controls and implement changes as needed to prevent further spread of COVID-19.

The investigation and review will be documented and include:

- Investigation of new or unabated COVID-19 hazards including:
    ○ Our leave policies and practices and whether employees are discouraged from remaining home when sick.
    ○ Our COVID-19 testing policies.
    ○ Insufficient outdoor air.
    ○ Insufficient air filtration.
    ○ Lack of physical distancing.

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- Updating the review:
  - Every thirty days that the outbreak continues.
  - In response to new information or to new or previously unrecognized COVID-19 hazards.
  - When otherwise necessary.
- Implementing changes to reduce the transmission of COVID-19 based on the investigation and review. We will consider:
  - Moving indoor tasks outdoors or having them performed remotely.
  - Increasing outdoor air supply when work is done indoors.
  - Improving air filtration.
  - Increasing physical distancing as much as possible.
  - Respiratory protection.
  - [describe other applicable controls].

Notifications to the local health department

- Immediately, but no longer than 48 hours after learning of three or more COVID-19 cases in our workplace, we will contact the local health department for guidance on preventing the further spread of COVID-19 within the workplace.
- We will provide to the local health department the total number of COVID-19 cases and for each COVID-19 case, the name, contact information, occupation, workplace location, business address, the hospitalization and/or fatality status, and North American Industry Classification System code of the workplace of the COVID-19 case, and any other information requested by the local health department. We will continue to give notice to the local health department of any subsequent COVID-19 cases at our workplace.

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Additional Consideration #2

Major COVID-19 Outbreaks

[This section will need to be added to your CPP should your workplace experience 20 or more COVID-19 cases within a 30-day period. Reference section 3205.2 for details.]

This section of CPP will stay in effect until there are no new COVID-19 cases detected in our workplace for a 14-day period.

COVID-19 testing

We will provide COVID-19 testing, frequency decided/if recommended by the local health department, to all employees present at our exposed workplace during the relevant 30-day period(s) and who remain at the workplace. COVID-19 testing will be provided at no cost to employees during employees' working hours.

Exclusion of COVID-19 cases

We will ensure COVID-19 cases and employees with COVID-19 exposure are excluded from the workplace in accordance with our CPP **Exclusion of COVID-19 Cases** and **Return to Work Criteria,** and any relevant local health department orders.

Investigation of workplace COVID-19 illnesses

We will comply with the requirements of our CPP I**nvestigating and Responding to COVID-19 Cases**.

COVID-19 hazard correction

In addition to the requirements of our CPP **Correction of COVID-19 Hazards**, we will take the following actions:

- In buildings or structures with mechanical ventilation, we will filter recirculated air with Minimum Efficiency Reporting Value (MERV) 13 or higher efficiency filters if compatible with the ventilation system. If MERV-13 or higher filters are not compatible with the ventilation system, we will use filters with the highest compatible filtering efficiency. We will also evaluate whether portable or mounted High Efficiency Particulate Air (HEPA) filtration units, or other air cleaning systems would reduce the risk of transmission and implement their use to the degree feasible.
- We will determine the need for a respiratory protection program or changes to an existing respiratory protection program under CCR Title 8 section 5144 to address COVID-19 hazards.
- We will evaluate whether to halt some or all operations at our workplace until COVID-19 hazards have been corrected
- Implement any other control measures deemed necessary by Cal/OSHA.

Notifications to the local health department

We will comply with the requirements of our **Multiple COVID-19 Infections** and **COVID-19 Outbreaks-Notifications to the Local Health Department.**